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5 Attorneys for Creditors
JAIME RODRIGUEZ, and
6 ANA LIDIA GOMEZ

**UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
SANTA ANA DIVISION**

13 In re
14 THE ORIGINAL MOWBRAY'S TREE
15 SERVICE, INC., a Delaware corporation
16 Debtor and
 Debtor-in-Possession,

BK Case No.: 8:24-bk-12674-TA

Chapter 11

**DECLARATION OF RONNIE JORDAN
IN SUPPORT OF MEMORANDUM OF
POINTS AND AUTHORITIES IN
SUPPORT OF CREDITOR, JAIME
RODRIGUEZ AND ANA LIDIA
GOMEZ'S MOTION TO APPOINT A
CHAPTER 11 TRUSTEE PURSUANT TO
11 U.S.C. 1104(a); AND MOTION TO
SUBSTANTIIVELY CONSOLDATE PINO
TREE SERVICES, INC., MOWBRAY
WATERMAN PROPERTY, LLC, AND
PHOENIX TRAFFIC MANAGEMENT,
INC. WITH THE DEBTOR'S
BANKRUPTCY CASE**

Date:

Time:

Location: 411 West Fourth St. Ctrm 5B
Santa Ana, CA 92701

Hon. Theodor C. Albert

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2 **DECLARATION OF RONNIE JORDAN**

3 I, Ronnie Jordan have personal knowledge of each fact set forth in this declaration based
4 upon my observation of, participation in, and recollection of, the matters and events to which I
5 declare. I could and would competently testify to each fact set forth in this declaration if called
6 and duly sworn by this Court. I certify and declare as follows:

7 1. I am an individual over 18 years of age for all times relevant and resident of North
8 Carolina.

9 2. I was recruited to be THE ORIGINAL MOWBRAY'S TREE SERVICE, INC.'s
10 ("MTS" and "Debtor") Chief Executive Officer and commenced work in that roll as of early June
11 2018.

12 2. On May 10, 2019, because I had acquired record contracts and revenues for the
13 Debtor in my first year with them, Mowbray Waterman Properties LLC ("MWP") purchased a
14 property for \$691,500 located at: 1515 Lucas Lane, Redlands, CA 92374-2758 (APN: 0168-071-
15 62) ("Lucas Lane Property") as part of my compensation package for use as my personal
16 residence (Ex. 13). My wife and I were informed about the Lucas Lane Property after it had been
17 acquired when Robin Mowbray handed us the keys and said this is your new home.

18 3. I was promised conveyance of title to the Lucas Lane Property at the end of my
19 contract term, and while myself and my wife lived there we treated it as our own, were not
20 charged any rent and all expenses and maintenance was paid by MTS or MWP.

21 4. After I was terminated as CEO for the Debtor in January of 2022, MWP attempted
22 to evict me from the Lucas Lane Property, and during eviction proceedings MWP through Robin
23 Mowbray's supporting declaration confirmed to the court that I was an ex-employee of Mowbray
24 Waterman Property, LLC. I concurred in that assessment because I worked for both companies.

25 5. While I was employed by MTS and MWP, I observed that the two companies were
26 run by Robin Mowbray is if one company. My joint-employment and buying the house for my
27 wife and I are examples of the one company observations.

1 I certify and declare under the penalty of perjury under the laws of the United States of
2 America that the foregoing is true and correct.

3 Executed 1/28/2025 at Robbinsville, NC.

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5 
6 Ronnie Jordan

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